



PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

*State of New Jersey*  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
25 MARKET STREET  
PO Box 112  
TRENTON, NJ 08625-0112

MATTHEW J. PLATKIN  
*Attorney General*

MICHAEL T.G. LONG  
*Director*

May 5, 2023

**Via Electronic Filing**

Honorable Matthew J. Skahill, U.S.M.J.  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza-4<sup>th</sup> & Cooper Sts.  
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al,  
Civil Action No.: 17-cv-02864 (NLH-MJS)

Dear Judge Skahill:

I represent the State Defendants in the above-entitled matter. On May 1, 2023, the Court directed the parties to meet and confer to select a date to depose a Rule 30(b)(6) witness from the Department of Corrections. Please note that the parties intend to conduct the witness' deposition on May 23, 2023.

Regarding the depositions of other fact witnesses, please note that the Plaintiff was deposed on May 4, 2023, and additional fact witnesses are scheduled to be deposed on May 10 through May 11, 2023.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: s/Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General

